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# ***OAR Box 1192***

*Prepped by Candice Davis*

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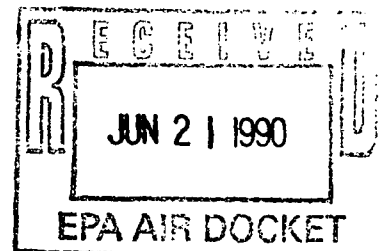
## Fletcher Oil and Refining Company

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June 11, 1990

Docket A-90-16 (LE-131)  
Fuel and Fuel Additives; Waiver Application  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460



Gentlemen:

Fletcher Oil and Refining Company wishes to comment on the EPA [L-3784-9] notice in the Federal Register/Volume 55, No. 108/Tuesday June 5, 1990, concerning ETHYL CORPORATION waiver of prohibition against introduction of MMT octane enhancer.

Fletcher Oil and Refining Company urges EPA to allow the use of MMT in unleaded gasoline for the following reasons.

MMT will help our company, a small independent refiner with limited octane, stay in business and produce the reformulated gasoline which will be required since Los Angeles is one of the nine cities not meeting federal standards.

The compound has been well proven. It has been in use in Canada for ten years. We understand that in an extensive series of tests using 48 cars driven to 75,000 miles each, and utilizing EPA test protocols and EPA preferred third-party testing and analysis organizations, there was proven NOx and CO reduction, no adverse effect on auto emission systems and infinitesimal public health and environmental effect.

Directionally, lowering reforming severity will reduce dependence on imported crude oil and will reduce benzene and aromatics in motor gasoline.

Sincerely,

James H. Lopeman  
President

cc: Mary T. Smith  
Director, Field Operations  
& Support Division (EN-397F)  
U.S. Environmental Protection Agency